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AFFIRMATIVE ACTION PROGRAM

BOSTON REDEVELOPMENT AUTHORITY

NOVEMBER 1972

## I Statement of Intent

The Boston Redevelopment Authority's Affirmative Action Program is a dynamic and positive plan designed to reaffirm and strengthen the Formal Affirmative Action Program - Amendment No. 17 to the Authority Personnel Policy approved on May 18, 1972. It embraces all provisions of the Department of Labor publication that contains Chapter 60 of Title 41 of the Code of Federal Regulations (Affirmative Action Programs); HUD Handbook of April 1972, 713.2, Policy and Planning for Affirmative Action in Employment Opportunity; HUD

Affirmative Action Plan - Boston Region - BOS 713.1, dated August 22, 1972; and, all other applicable directives, regulations, and laws of both Commonwealth and Federal origination.

This proposed drastic positive action plan reflects the atmosphere of social change present in America, as reflected by the strong changes in State and Federal Statutes, and will ensure equal opportunity and non-discrimination with respect to females and minority group members: Negro-black, Spanish speaking, American Indian, Orientals, and other minorities, plus persons of all religious and national origins.

A strong input to this program is the previously approved Affirmative Action Advisory Council which will play a strong roll in assisting the Director to develop and implement affirmative action and equal opportunity plans.

The Equal Employment Opportunity portion of this program is designed to increase employment and training opportunities for females and minority employees and applicants. In addition, it will increase their strength at the middle and upper grade levels and in positions of responsibility.



This program when approved will be implemented with the cooperation of the U.S. Department of Housing and Urban Development. Compliance with provisions of this program will be coordinated with the Assistant Regional Administrator for Equal Opportunity of the Regional Office of the Department of Housing and Urban Development.

## Equal Employment Opportunity Statement

It is the policy of the Authority to provide Equal Employment Opportunity based on the following excerpts from the Authority Personnel Policy:

" 1. Basic Principles

(a) Merit System:

The employment of all personnel and actions affecting employees shall be based on merit, ability and justice.

(b) Non-Discrimination:

There shall be no discrimination against employees or applicants for employment on account of race, creed, age, color, national origin, sex or any political or union affiliations.

The Authority will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their age, race, color, religion, sex, or national origin. Such action shall include, but not be limited to, the following: employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; medical and other benefits and selection for training, including apprenticeship."



Administratively, the Authority will promote the full realization of equal opportunity through continuing positive programs in every project, department and functional work unit. As stated above, this policy applies to everyone employed by the Authority in all aspects of employment policy and administrative practice. This administration of equal employment opportunity includes, but is not limited to:

1. An active Affirmative Action Council that shall be representative of a cross section of the Authority employee structure that is nominated by the Director and approved by the Authority.

2. The Authority will pay equal compensation for comparable positions, dependent on performance of employees, and the comparability of jobs will be determined by levels of performance, skill, education, experience, and complexity of duties required for job performance.

3. Authority will assure that all advertising and solicitations to prospective employee sources; colleges; schools; organizations; etc., do not limit applicants to jobs advertised by any description of the position vacancy and will stress that the Authority is an Equal Opportunity/Affirmative Action Employer.

4. Authority will establish monitoring processes and procedures to ensure that Equal Opportunity and Affirmative Action plus Contract Compliance programs all comply with Title VII of the Civil Rights Act of 1964, as amended; Executive Order 11246 as amended by Executive Order 11375; and other pertinent equal opportunity provisions of grants and contracts of HUD.

### III

#### Terms, Conditions, Responsibilities and Privileges of Employment

Terms and conditions of employment are as outlined in each Development Program Employee's initial appointment letter, (Authority Resolutions 12/30/68 - definition of Development Program Employees), plus the Authority Personnel Policy and Employees Handbook, plus various administrative memoranda issued periodically by the Director for proper administration of the Authority.

All employees are responsible to fulfill their employment obligations to the Authority in the course of their everyday duties in accordance with the Authority Personnel Policy and other directives derived from the Policy and applicable HUD documents.

As an Equal Opportunity/Affirmative Action Employer all employees are to be treated equally in the administration of Authority and HUD policies.

Female and minority employees shall be assured of equal opportunity to participate fully in all terms, conditions, responsibilities and privileges of employment. Positive action shall be taken within 6 months after approval of this program to ensure that these classes of employees have, on a continuing basis, the following:

1. Equivalent compensation and grade for comparable jobs.
2. Accelerated job opportunities in hiring and promotion in all grades for which qualified.
3. Promotional rates similar to all other employees and equal opportunity for upward mobility within the Authority's position classification and grade structure.



4. Equal opportunity for training and education to develop and upgrade their skills and abilities.

5. Job descriptions that reflect actual functions and duties. Female and minority employees shall not be required to possess higher qualifications than other employees holding a job title in the same grade.

6. No requirement for tests except those clerical and drafting tests required prior to hiring for specific sub-professional and technical drafting positions.

No tests shall be administered until the applicant has had an opportunity to review all available vacancies.

Test results shall not be used to exclude prospective employees from higher positions for which they may be qualified.

Any other tests for hiring or promotion must be recommended by the Director of Personnel, reviewed by the Affirmative Action Council, and approved by the Director and validated as necessary.

7. Equal participation in Authority-funded activities and programs:

1) Attendance at conferences, seminars, and conventions.

2) Staff conferences.

3) Attendance and presentations at Authority Meetings, as required.

4) Tuition assistance and training programs for job related courses and seminars, plus all training available to increase skill levels.

5) Represent the Authority and Director in meetings with the public, neighborhood groups, and other agencies.

8. Employee benefits shall apply equally to all salaried and maintenance employees. This applies to all fringe benefits of the Authority Personnel Policy: vacation, compensatory time, sick time, advanced sick leave, leaves of absence without pay, retirement program, health and life insurance program, etc., which shall be applied equally to all salaried and maintenance employees regardless of their grade or status.

Such employee benefits as are available to Co-Ops, Professional Part-Time, and Building Service Employees shall apply equally to each employee in these classes.

In addition, benefits shall be available to all employees without regard to their family status outside the Authority.

Affirmative Action Advisory Council shall review employee benefit programs with a goal of improving present benefit programs.



### Maternity Leave Policy

It is the Policy of the Authority to grant leaves of absence for Maternity Leave in accordance with the provisions of Title VII of the 1964 Civil Rights Act, as amended, and treat this absence as any other normal temporary disability.

Under the Policy, the Authority is obligated to grant leaves of absence for a reasonable period - 6 or 9 months - determined by physical condition of the employee, as attested by the attending physician. All accrued Sick Leave, Compensatory Time, and Accrued Vacation may be utilized subsequent to the employee's physical date of departure from the Authority prior to the effective starting date of employee's Leave of Absence without Pay.

The Authority will reinstate the employee to her previous position or to a position substantially equivalent to her previous position without loss of seniority or seniority benefits.

### Statement of Responsibility

The Authority shall establish the policy for the implementation of the Affirmative Action Program in accordance with applicable Executive Orders, HUD Directives, and other pertinent orders from higher authority.

The Administration of the Affirmative Action Program shall be implemented by the Director. To execute the administration of the Affirmative Action Program, the Director shall utilize the Affirmative Action Advisory Council, the Director of Personnel, and the Compliance and Equal Opportunity Officer. The Director may also utilize other staff employees as deemed necessary to perform special tasks in conjunction with the Affirmative Action Program. Liaison between the Authority and the Department of Housing and Urban Development on all matters relating to equal employment opportunity and compliance shall be by staff members designated by the Director.



## The Affirmative Action Advisory Council

On September 21, 1972, the Boston Redevelopment Authority Board approved a recommendation made by the Director, Mr. Robert T. Kenney, which established an Affirmative Action Advisory Council. The Council will be responsible to the Director for assistance in devising and implementing the Authority's Affirmative Action Program.

The membership of the Council currently includes, ex officio, the Director of Personnel and the Compliance and Equal Opportunity Officer and seven additional members of the Boston Redevelopment Authority staff. These additional members are now, and shall be in the future, representative of the planned composition of the Authority.

Upon recommendation of the Director of the Authority, (see Memorandum of September 21, 1972 to the Boston Redevelopment Authority from Robert T. Kenney, Director) it has been agreed that the preliminary duties of the Council would "include, but not be limited to, the following functions: meet monthly to review the status of the Affirmative Action Program; make affirmative action recommendations to the Director of Personnel and Compliance and Equal Opportunity Officer; assist in review and resolution of alleged grievances before the grievances become major." The Council will report directly to the Director of the Authority "on various phases of the Affirmative Action Program that require more emphasis."

In the development of its role as an integral part of the process of Affirmative Action, the Council will also:

- 1) make reports on a quarterly basis to the Director of the Authority apprising him of the status of all Federal, State and City laws and regulations pertaining to equal employment, and recommending to him, whenever it is believed necessary, the dissemination of any and all information in this category to the staff of the Authority. The Council will also make recommendations to the Director of the Authority for the filing of legislation, ordinances, petitions, etc., which may further strengthen and improve the Authority's equal employment practices.

- 2) The Council will also undertake a review of current procedures pertaining to the dissemination of information to the Authority staff on such matters as the Personnel Policy of the Authority, the Affirmative Action Plan, all pertinent Federal and State laws, orders, regulations, etc., including any and all changes in the foregoing, and will report their findings, with recommendations for whatever changes or improvements The Council may deem advisable, to the Director for his consideration.
- 3) The Council will also review all current policies, practices, and procedures relating to "fringe benefit" rights of employees, including the following: vacations, compensatory time, sick leave, advanced sick leave, leaves of absence without pay, training, tuition assistance, retirement program, health and life insurance program, workmen's compensation, etc., and will, wherever it is believed necessary, recommend changes to the Director for his approval.
- 4) The Council will assist the Director of the Authority in reviewing present procedures pertaining to employee grievances and will make recommendations to the Director for changes in these procedures wherever it may be believed to be necessary.
- 5) The Council will have a continuing responsibility for keeping available to the public all public documents pertaining to the work of the Authority, including but not limited to the following: Authority Board Actions, Authority Personnel Policy, Authority Affirmative Action Plan, Affirmative Action Progress Reports, Authority Job Descriptions, and present and past Tables of Organization.

In recognition of the purpose of an affirmative action program as defined in Subpart B (Required Contents of Affirmative Action Programs--60-2.10) wherein it is stated that "An affirmative action program is a set of specific and result-oriented procedures to which a contractor commits himself to apply every good faith effort," and, further, that "an acceptable affirmative action program must include an analysis of areas within which the contractor is deficient in the utilization of minority groups and women, and further, goals and timetables to which the contractor's good faith efforts must be directed to correct the deficiencies and, thus to increase materially the utilization of minorities and women, at all levels and in all segments of his work force where deficiencies exist the Affirmative Action Advisory Council will play a strong role in reviewing current policies and procedures and recommending alternatives to achieve the objectives quoted above.



The Affirmative Action Council of the Boston Redevelopment Authority will, within six months following the approval of this plan, undertake and complete analyses and reports on the following subjects, (all of which are included in Subparts B and C of Executive Order #4); 1) Utilization analysis; 2) establishment of goals and timetables; 3) additional required ingredients of affirmative action programs; 4) development or reaffirmation of the equal employment opportunity policy; 5) dissemination of the policy; 6) responsibility for implementation; 7) identification of problem areas by organizational units and job classifications; 8) development and execution of programs; 9) internal audit and reporting systems. These analyses and reports will be submitted to the Director of the Authority for such further action as he may deem appropriate.

In addition, the Council will issue and make readily available to all employees its first progress report within six months following the approval of this plan, and at six month intervals thereafter. Council progress reports will cover but not be limited to many of the topics listed above as well as the following areas: analysis of complete promotion and salary increase statistics with particular emphasis on actions affecting minority group persons and women including analysis by sex and race of clerical and secretarial positions, analysis of the recruitment and hiring process and statistics by sex and race of all applicants for positions within the Authority.

The Council will review and make recommendations to the Director of the Authority, whenever necessary, concerning documents currently prepared by the Personnel Department of the Authority pertaining to but not limited to: 1) Distribution of Sexes by Grade; 2) Census of Employees (See attachments). The Council will also recommend to the Director the advisability of having additional reports prepared by the Personnel Division which are not currently prepared, including but not limited to examination of job titles and their relation to minority group or female employment to determine the distribution of these latter two groups by job title, and in order to recommend the correction of any inequities.

## Personnel Policy

The Director of Personnel shall have prepared for approval by the Director and submission to the Authority, a revised Personnel Policy updating the present policy with all amendments thereto containing the Authority's approved Affirmative Action Program as an annex to the revised Personnel Policy. The task shall be completed within two months after the approval of the revised Affirmative Action Program.

The approved revised Personnel Policy shall be distributed to all Senior Executives and Supervisors, Heads of Departments, Project Directors, Library, all Site Offices and Departments and made available to any employee on request. Notification must be given to all employees notifying them of the existence of a revised Personnel Policy and the methods by which they may obtain this revised policy.

Subsequent to the approval of the revised Personnel Policy, an Employee Benefits Handbook shall be prepared within one month for approval by the Director and distribution to all employees. This handbook shall contain the most cogent sections of the Personnel Policy that are of interest to employees. This handbook shall include, but not be limited to: all direct employee benefits; employee rights under all current laws; administrative procedures - working hours, accountability for time, etc; training programs and opportunities; fringe benefits and procedures - health and life insurance, workmens compensation, administrative leave, etc; grievance procedures; Authority's performance evaluation, salary



increase and promotional policies; salary range and step plan and position classification chart; plus Affirmative Action Program. The Employee Handbook will be made available to all applicants, on request, and will be provided to all prospective employees well before hiring so that these applicants are certain that the Authority is an Equal Opportunity/Affirmative Action employer.

## JOB DESCRIPTIONS

Director of Personnel utilizing a special Personnel Analysis Unit shall with the guidance of the Affirmative Action Advisory Council, conduct a survey of all Position Classification titles and prepare appropriate job descriptions for all titles. In short, the Authority will provide continued maintenance of the Classification Plan and the Salary Range structure. The first step will be the preparation of 1972/1973 Job Descriptions to reflect the responsibilities of all Position Classification titles. This initial effort shall be completed within four months after the adoption of the program and copies of the job survey and descriptions with all supporting documentation made available to Supervisors, Employees, Heads of Departments, Director, Authority, and Affirmative Action Advisory Council for review.

Maintenance review of the Job Descriptions, Position Classification Titles, and Salary Range structure shall be cyclical and reviewed annually. Maximum use of employee interviews and conferences with Supervisors, Project Directors and Department Heads will be utilized to assure representative job descriptions.

Subsequent to the initial survey and revision of Job Descriptions, each position shall be further analyzed to assure that descriptions accomplish the following:

- 1) insure freedom from bias in regard to race, color, religion, sex, age, or national origin both in terms of duties and qualification requirements,
- 2) accurately reflect the duties and responsibilities actually performed by the occupants of every job title,



---3) consistency in terms of described duties and qualifications for the same job title from one location, department, or office at the Authority to another,

---4) insure that jobs predominantly held by minority group persons or women do not require, in pattern or in practice, higher qualifications than those titles in the same grade that are predominantly held by non-minority group male employees.

---5) insure that jobs predominantly held by minority group persons or women do not require, in pattern or in practice, the execution of more complex duties or responsibilities or the possession of higher skill levels than those titles in the same grade that are predominantly held by non-minority group male employees.

---6) insure that all occupants of each job title have comparable or equivalent qualifications.

---7) insure that all occupants of each job title perform duties of comparable responsibility and complexity requiring comparable skill levels.

### Reorganization of the Position Classification Chart

On completion of the Job Description Survey, the Director of Personnel, with the guidance of the Affirmative Action Council and utilizing the Personnel Analysis Unit, will place all Position Classifications into a draft 1973 Position Classification Plan to accomplish the following:

1. Place all Position Classification titles with equivalent duties, required skill levels, qualification requirements, complexity of duties, level of responsibility, in the same salary grade.
2. This draft revision of the Position Classification Plan will be accomplished with minimum regard for present salary grades assigned to positions to ensure that equivalent work, skills, qualifications, and degree of responsibility are equated in grades.

To draft the revised Position Classification Plan, factors will be utilized for years of training, education, and work experience in the Authority (and before joining the Authority staff) to determine the grade level of each position.

Factors shall be cumulative to establish factor totals appropriate to each grade level. Work experience will include all experience, paid or non-paid, relatable to Authority positions and non-degree educational programs relatable to Authority work will also be factored. As new positions are created, in the future, they will also be factored to determine the appropriate grade level.



It follows that the draft Position Classification Plan will contain grade levels with all positions in each grade having the same factor total or as close thereto as possible. Starting with the lowest grades, each succeeding grade will require higher overall qualifications than the preceding grade.

All Position Classifications shall be considered as sub-professional, professional, or managerial and there will be no closed avenues, by job title, to professional technical training and advancement for any employee at any grade level.

If any Position Classification is downgraded as a result of this process of revising the Position Classification Chart, occupants of the positions, will be reclassified to a lower grade only if there is a margin for a salary increase, if not, the employee will remain in the same grade as an incumbency position.

New hirees are normally hired at the first step of a grade, but, may be placed at any step within the grade if their factor total falls between grades.

After the draft Position Classification chart has been completed and approved by the Director of Personnel it will be forwarded with all supporting documentation for review to Supervisors, Heads of Departments, Project Directors, and the Affirmative Action Advisory Council for comments and recommendations.

When comments and recommendations are received, they will be incorporated in the draft Position Classification Plan, or, if not feasible, discussed with Director prior final preparation and submission of revised Position Classification Plan to the Authority, by the Director, with any appropriate recommendations for upgrading Position Classifications,

for consideration. This process shall be accomplished within four months of the completion of the Job Description Survey with upgrading to occur when approved and directed by the Authority.



## Hiring

The Director of Personnel, Compliance and Equal Opportunity Officer and Affirmative Action Advisory Council shall continually review the Authority's hiring practices and processes to ensure that the appointment process neither discriminates nor tends to discriminate against any applicant on the basis of race, color, religion, sex, age, or national origin.

To assure that this review is a continuing one, the following measures will be undertaken within 2 months of approval of this program:

1. Review and revise as necessary, and in accordance with Federal and State regulations, the standard employment application to eliminate any information that could be interpreted or evaluated, when reviewing the completed application, to foster the appearance of discriminatory practices in hiring.
2. Standardize the interview format in accordance with efficient administrative procedures to assure that interviews concentrate primarily on the applicants qualifications and suitability to fill a specific vacancy or vacancies. The Director of Personnel will provide all supervisors with standardized interview instructions with highest objective standards for conducting interviews of applicants.
3. Current tests for sub-professional clerical or secretarial positions, and the standard drafting test, shall be continued, as heretofore, as appropriate and necessary for evaluating necessary skills prior hiring to sub-professional, secy/cler employees, or drafting technicians. No tests shall be administered until prospective employees have had an opportunity

to review all available vacancies. Test results shall not be used to exclude prospective employees from higher positions for which they may be qualified. The Authority does not utilize other tests and will not utilize them unless they are validated and approved by the Affirmative Action Advisory Council, Director of Personnel, and Director as necessary for evaluating job performance.

4. Current position vacancies with job descriptions, new positions, and known future vacancies shall be kept posted on a continuing basis on all bulletin boards, at the reception area, and maintained current in the Personnel Office. As noted in Section XIII, Recruitment, positions will be maintained vacant as long as is feasible before outside recruiting sources are utilized. If internal and external sources do not provide suitable applicants, appropriate media advertising shall be utilized. All solicitations, advertisements, and other efforts to attract applicants shall stress that the Authority is an Equal Opportunity/Affirmative Action Employer and jobs will not be categorized in any way to discourage any applicant that feels qualified to fill the position.
5. Job vacancy lists shall contain position classification and salary ranges and all other data and necessary information to assure that any applicant, internal or external, will easily be aware of the nature of the position, the department, location, and any other pertinent facts.
6. No applicant for employment shall be denied the right to complete an employment application for review. Applicants



that inquire or apply in person or by mail, letter, resume, etc., shall be provided with job vacancies and pertinent data noted in sub-paragraphs 4 and 5 above, the BRA Fact Book and the Position Classification and Salary Range and Step Plan. Whether the prospective applicants feel qualified for the positions available or not does not foreclose them from completing an employment application for consideration since the Authority is a public agency. It shall be carefully explained to all applicants that submission of an application guarantees review and consideration for existing and future vacancies. It does not guarantee a job interview unless there is a reasonable prospect of hiring and it would be to the mutual advantage of the applicant and the Authority to conduct an interview.

## Recruitment

It is the policy of the Authority that new appointments will not be made until all provisions of the Equal Employment Opportunity Statement have been complied with.

In administration of this policy, the Authority is increasing its hiring ratio of female and minority applicants to male hirings shall progressively increase female employee staff toward 50% of total staff as indicated in the attachment "Women Distribution Achievement" and minority representation to 20% of total staff as indicated in the attachment "Minority Group Distribution Achievement." Realizing that arbitrary short-term deadlines to accomplish the above would not be realistic, the proposed target date to achieve these objectives, incident to available funding, and anticipated staff turnover, is January 1974. Present female staffing is at 37% and minority staffing is at 14.5%.

Administrative procedures to accomplish the policy and objectives in the above paragraphs shall require that the Director of Personnel and Compliance and Equal Opportunity Officer aggressively seek out and exhaust all sources of qualified female and minority employees for positions at every level and, on a continuing basis, assure the recruitment of female and minority applicants for participation within all projects, departments, and functional units of Authority.

In addition, the Director of Personnel, as part of the recruitment process, will make every effort to promote from within the Authority staff by posting job vacancies and descriptions in appropriate Authority



spaces. All employees will be encouraged to request that they be considered for transfer, reclassification, and/or, promotion to fill the vacancy, and each staff employee, who so requests, will be considered on the employee's merits to fill the vacant position. If there is no employee qualified to fill the position, outside sources will be activated for applicants, as noted above.

The general thrust of outside and internal recruitment will be directed not only to increase overall female and minority employee percentages but to achieve the percentages shown in the attachments WDA and MGDA.

If it is deemed feasible and consistent with the successful continued operation of Authority functions, the Director may leave a position vacant as long as necessary to fill it with an applicant who will further the objectives of the above stated recruitment policy.

Statistics and data on this recruitment program will be maintained on a monthly basis to monitor the progress of the above efforts, and will be made available, to the Authority, Affirmative Action Advisory Council, employees and the appropriate HUD officials.

## Minority Group Distribution Achievement

### Goals and Timetable

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Total Employees	Grade 4 - 8	Grade 9 - 12	Grade 13 and above
385	97	176	112
Current Minority Employment	29	9	8
Long Range Goal 16-22%			
Timetable 15-16%			
June 1973	15 - 16	26 - 28	17 - 18
16-20%			
June 1974	16 - 19	28 - 35	18 - 22
June 1975	20 - 22%		

The chart is designed to upgrade, promote and recruit minorities at all grades and above grade levels. The distribution is to be ultimately achieved in a 32 month period.

## Women Distribution Achievement

### Goals and Timetables

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Total Employees	Grade 4 - 8	Grade 9 - 12	Grade 13 and above
385	97	176	112
Current Women Employment 140	76	53	11
Long Range Goal 40-60%			
Timetable 40-45%			
June 1973	39 - 44	70 - 79	45 - 50
45-50%			
June 1974	39 - 48	79 - 88	50 - 66
June 1975 - 40 - 60%			

The chart is designed to upgrade, promote and recruit women at all grades and above grade levels. The distribution is to be ultimately achieved in a 32 month period.



### Methods of Recruitment

As noted in the section on Recruitment, the Authority shall utilize unique, innovative, and aggressive recruitment of females and minority employees. The latter class of applicants are defined as: Negro/black; American Indian, Oriental, Spanish Americans, and other minorities. Affirmative Action recruitment efforts shall include both promotions from within and hiring of new staff with emphasis on increasing female and minority staff members.

To accomplish the above Affirmative Action, sources shall include continuing direct contact and correspondence with the following:

1. Placement offices at colleges with predominately female and black enrollments, including field trips by selected staff members and/or Affirmative Action Advisory Council to explain Authority opportunities.
2. Organizations concerned with equal opportunity in employment for female and minority groups.
3. Media sources that reach, primarily, females and minority groups.
4. Community and Neighborhood Action Groups that can refer female and minority applicants.
5. Job bank organizations, at all levels, private and public, concerned with females and minority group opportunities.
6. Sub-professional, secretary/clerical employees, employed by the Authority are to be considered for internal promotions to responsible non-clerical positions and encouraged by training to qualify for higher grade status.

The Director of Personnel shall have a survey conducted of all Affirmative Action recruitment sources after contacting all appropriate local agencies for recommendations. This survey shall be made available within two months to the Director and Affirmative Action Advisory Council for review. As noted above, these sources shall be utilized for personnel referrals for recruitment to vacant or new Authority positions.

By special directives of the Director, or his designee, female and minority group employees shall be utilized as an important affirmative action recruitment source.

Recruitment and recruitment advertising sources shall be kept informed of the Authority's status as an Equal Opportunity/Affirmative Action Employer and the Authority's specific objectives in discrimination - free recruitment and hiring practices and shall be certain that advertising and recruitment sources have a good record of equal employment opportunity.

All efforts in this special recruitment area by the Director of Personnel shall be made available, on request, to the Affirmative Action Advisory Council and employees and the Department of Housing and Urban Development for review.

For broadest transmission of the Authority's Affirmative Action Program, the phrase emphasized - "Boston Redevelopment Authority is an Equal Opportunity/Affirmative Action Employer" - shall be included in all correspondence and manuals concerned with recruitment.

## Co-Op Programs

Cooperative work program shall be continued as long as it remains a feasible personnel program and adjunct to the salaried staff and occupies positions at the service, training, and sub-professional level that are more efficiently and economically performed by co-op work students than hiring salaried staff.

Participating colleges in the Co-Op work program shall be advised by the Director of Personnel of the range of cooperative jobs available well prior to the Co-Op program work turnover and provided with skeleton job descriptions. College Co-Op Coordinators will also be provided with a copy of the Authority Personnel Policy and Affirmative Action Plan. On referrals for Co-Op job interviews by College Co-Op Coordinators, the description of the position to be filled shall be made clear to the prospective employee.

Prior to appointment, provided Co-Op applicant is accepted by Supervisor, Director of Personnel and Director, the applicant shall be provided with the Authority's Personnel Policy, Affirmative Action Program and Employee Benefits Booklet.

As closely as possible, Co-Operative work positions shall be filled with equal numbers of male and females. The Director of Personnel shall press College Co-Op Coordinators to provide applicants along the above guideline. In addition, every effort will be made to increase minority employees in the Co-Op work program.

Provided funds permit or grants can be obtained, Co-op work programs will be initiated with colleges and universities having off-campus work semester programs that have predominately female and/or black enrollments.



## Promotions

The Director shall effect the following measures in order that promotional opportunities at the Authority will be available to all employees on an equal basis. These actions are to be completed within six months after the approval of this program.

Implement procedures to:

1. Keep employees advised annually of their anniversary date for annual performance and salary reviews.
2. Advise evaluating supervisors to discuss, with each employee being evaluated, the employees performance and general personnel performance and any other employment situations the employee desires to discuss.
3. Advise evaluating supervisors that employees will be allowed to review their performance evaluation before it is submitted.
4. Advise employees that they may, on request, review their personnel file and insert material if desired.

Annual Performance and Salary Evaluations are normally held during the six month period August 1 through January 31 to cover the great majority of all employees. Employees hired from February 1 through July 31 shall have their anniversary advanced six months for incorporation in the August-January annual cycle.

Evaluation forms on all salaried employees are distributed to supervisors during the month prior to salary anniversary and evaluated, then fed back via the Head of Department or Project Director, to the Director of Personnel for review and preparation of a salary package for the Director's review and final decision prior submitting a monthly salary package to the Authority for approval.

Employees who believe that their performance evaluation was not just or equitable should discuss it with their supervisor, head of department and/or project director, plus the Director of Personnel. The Compliance and Equal Opportunity Officer is also available for guidance counseling in such matters. If the employee does not gain satisfaction from any of these administrative avenues, the employee is always free to advise the Affirmative Action Advisory Council, Director of Personnel, and then institute an administrative grievance procedure.

Monthly, August through January, on completion of salary reviews, and Authority action on the salary package, the Director of Personnel shall utilize the Personnel Analysis Unit to prepare a statistical analysis of the personnel salary actions to provide complete data on the salary package to include: numbers evaluated, promotions, steps, average increments, number no steps, etc., also broken down further to indicate affirmative action taken on female and minority employees. This data will be made available to the Affirmative Action Advisory Council for review and comment on a monthly and cumulative basis.

The Director of Personnel, utilizing the Personnel Analysis Unit and in conjunction with the Affirmative Action Advisory Council, will have prepared skill profiles on all Authority employees to assist in developing the full utilization of the overall Authority talent pool. The first inventory of skill profiles shall be completed six months after approval of this program. Inventory of skill profiles will be kept for regular reference of the Director, Director of Personnel and Affirmative Action Advisory Council. Skill profiles and inventory will be updated annually, or more often dependent on turnover of staff. New employees shall be skill profiled as they join the staff.

Each skill profile shall be compiled on forms susceptible to computerization and shall include all skills of each employee acquired through education, job experience, training, language skills, and other factors that can be incorporated to show the present and potential skill level of the employee. Before any skill profile is considered complete and accurate it will be necessary to: research an employees record; the employee will be interviewed; and, after completion of the profile, it will be reviewed for concurrence of the employee. During this entire process employees will be encouraged to avail themselves of all opportunities to increase their skill profile. Employees will be encouraged to initiate updating of skill profiles when new skills are acquired or additional education is gained.

The skill profile inventory shall be consulted by the Director, Director of Personnel, and designated Authority supervisors when a job vacancy occurs or is anticipated.

The Director of Personnel shall accord special attention to the possible upgrading and promotion of employees in the following work situations:

1. Females and minority employees in grade levels or job titles where they comprise 70% of the work force in that grade or job title.
2. Female and minority employees predominately represented in lower grades of grade step chart and in lower ranges of job families.
3. Sub-professional, secretary/clerical employees including other service occupations.
4. Utilize innovative training to upgrade secretary/clerical employees to technical or other positions where clerical skills may be utilized but not be predominant.



5. Upgrade the 5 lowest grades (Grades 1 through 3 are currently vacant) to delete positions and where skills available in these grades require good proficiency, upgrade to Grade 6, or at least one level above grades for training and apprentice positions.
6. Assume that secretary/clerical and service positions are rewritten to exclude any appearance of bias and shall reflect the skill level, complexity of duties and responsibilities.
7. Review all secretary/clerical positions within six months to determine if employees in these positions are qualified through on the job training to be upgraded to technical or administrative duties.

Subsequent to completion of this task the results will be reviewed by the Director and the Affirmative Action Advisory Council for further action.

## Grievance Procedures

Any employee grievance or alleged grievance may be instituted by an employee if the employee believes that he/she has been discriminated against or treated at variance with the Authority Personnel Policy or the Affirmative Action Program.

Grievances shall be filed in writing with the employees immediate supervisor. If the alleged grievance cannot be resolved at the working level, it shall be forwarded to the head of department or project director in 5 working days. If it cannot be resolved at the head of department/project director level in 5 work days, it shall be forwarded to the Director of Personnel and Compliance and Equal Opportunity Officer for resolution where every effort will be made to mediate the grievance at this level for 10 working days.

If it is not possible to resolve the grievance at this above level, the Director of Personnel shall call a hearing of the Grievance Council consisting of the Director of Personnel, Compliance and Equal Opportunity Officer, Affirmative Action Advisory Council, and a representative of the Director, and the General Counsel.

The Grievance Council will hear the complete grievance and all progress during each step, noted above, of the grievance and efforts to mediate the grievance enroute to the Grievance Council. The complainant will be present at the hearings, as well as the immediate supervisor, and head of department and/or project director. Field investigations to observe work conditions may be utilized plus any other techniques to reach a just finding will be utilized.

When the Grievance Council reaches a finding, they shall inform the complainant and forward the finding to the Director for resolution by administrative action or present the grievance situation to the Authority for review for appropriate action.

Grievances not resolved to the satisfaction of the complainant may be followed up by the complainant requesting an Authority hearing for final Authority resolution.

This procedure does not foreclose the aggrieved from taking any other steps that the complainant considers appropriate.

Employees who seek relief from an alleged grievance through the above procedure or through any procedure created under state or federal statutes shall not be subject to any reprisal, intimidation or harassment in any terms or conditions of employment.

The Director of Personnel in conjunction with the Affirmative Action Advisory Council shall prepare appropriate forms for filing of grievances to assure that all pertinent data is incorporated in the filing of the initial alleged grievance. This form shall be completed within one month after the approval of this program. All employees and supervisors shall be made aware of the procedure.



### Contractors

The Authority Affirmative Action Program requires equal opportunity on the part of all contractors as prescribed by the revised Authority Equal Opportunity Compliance Policy approved on September 7, 1972. In addition, compliance is required with the Authority Bid Conditions, Affirmative Action requirements, Equal Employment Opportunity of July 14, 1972. All above documents, attached, comply with all provisions of Title VII of the Civil Rights Act of 1964 as amended; pertinent executive orders; federal regulations; and the Contract Manual of the Department of Housing and Urban Development.

Under the supervision of the Director, the Compliance and Equal Opportunity Officer is responsible for the administration and implementation of the above directives and all other matters pertaining to compliance. This officer shall also maintain close liaison with the appropriate official at the Regional HUD office.

The Compliance and Equal Opportunity Officer shall continue intensive efforts to identify and locate minority and female businesses that might provide services to the Authority and encourage them to participate in the open bid system utilized by the Authority for all contract services.

The Affirmative Action Council, if they desire, may at any meeting, with sufficient advance notice review the operation of the Authority's Compliance and Bid operations.

Note: Attachments - Are 1st 2 attachments to Question 13 of HUD 4/17/72 letter.

November 2, 1972

MEMORANDUM

TO: The Boston Redevelopment Authority

FROM: Robert T. Kenney, Director

SUBJECT: Proposed Re-Affirmation of Authority  
Affirmative Action Program

Attached and recommended for approval is a proposed Authority Affirmative Action Program as Amendment No. 19 to the Personnel Policy.

This proposed program re-affirms and strengthens Amendment No. 17 to the Authority Personnel Policy approved on May 18, 1972. It has been prepared after extensive analysis of all pertinent Federal guidelines to re-affirm and strengthen Amendment No. 17 and to ensure that we are in full compliance with all Federal Statutes, executive directives, and Department of Labor guidelines.

The proposed program will require a considerable effort by the Personnel Department to assure compliance and it will also bring the Affirmative Action Advisory Council into a position and role where the Council can be of great assistance to the Authority.

The Affirmative Action Advisory Council of the Boston Redevelopment Authority has extensively studied and reviewed the proposed plan and has voted its approval. The Council will be expected to make recommendations to the Director concerning amendments designed to improve and strengthen the Affirmative Action Program.

Also attached is a proposed vote.

- Attachment A - Authority Affirmative Action Program, November 1972 -  
Amendment No. 20 to Authority Personnel Policy
- B - Vote on Authority Affirmative Action Program



